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October 13, 2021

**VIA CM/ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010-PKC;  
*State of Texas et al. v. Google LLC*, No. 1:21-cv-06841-PKC**

Dear Judge Castel:

We write to correct an error made during the September 24, 2021 case management conference. Counsel for Google explained to the Court that Google had produced 2 million documents to the State of Texas. While that figure is correct, it includes documents that Google produced to the Department of Justice in addition to the approximately 152,000 documents that Google produced in response to the Texas AG's civil investigative demand (CID) concerning ad tech issues. Later, counsel for Google stated that it had produced 2 million documents to some of the private plaintiffs – that was incorrect. Google reproduced the approximately 152,000 documents that were responsive to the Texas AG's ad tech CID to certain of the private plaintiffs, and will reproduce them to the remaining private plaintiffs within 30 days after a protective order is entered. Pursuant to Your Honor's individual practices, we note that no conference is currently scheduled.

We do not believe this correction impacts Your Honor's order, which makes clear in any event that Google should not produce the "documents produced to the U.S. Department of Justice," but wished to correct the record. Dkt. 129. We apologize for any inconvenience, and would be happy to answer any questions the Court may have about the production.

**WILSON  
SONSINI**

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Respectfully Submitted,

s/ Justina K Sessions

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s/ Eric Mahr (by consent)

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*Counsel for Google LLC*

cc: All Counsel of Record (via CM/ECF)